

November 10, 2021

Via Email (CronanNYSDCChambers@nysd.uscourts.gov)

The Honorable John P. Cronan
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: Diocese of Rockville Centre v London Market Insurers, No. 21-cv-00071 (JPC)

Dear Judge Cronan:

This letter is submitted jointly by plaintiff The Roman Catholic Diocese of Rockville Centre, N.Y. (the "Diocese") and defendants Certain Underwriters at Lloyd's London and Certain London Market Companies ("LMI") in response to the Court's Order dated October 27, 2021 (Docket Item 69):

By November 10, 2021, the parties must (1) meet and confer about the dispute and (2) submit a joint letter updating the Court on the status of the dispute and whether the parties consider the dispute resolved. SO ORDERED.

The Diocese and LMI met and conferred in good faith on November 9, 2021, regarding the status of the dispute relating to the Diocese's disclosure of documents in connection with the mediation. Prior to that time, LMI and the Diocese had been in regular communication regarding the Diocese's production of documents and increasing its utility to LMI. Unfortunately, the parties encountered a number of technical issues that were not resolved until this week. As a result, LMI have not yet had the opportunity to fully review the recent production and utility features addressed in the last joint letter submitted by the parties.

The parties will continue their efforts to resolve their document dispute. Toward that end, the parties jointly ask that they be permitted to report back in 28 days (December 8, 2021) with regard to whether the dispute has been resolved. Presently, LMI do not consider it resolved.

Very truly yours,

/s/John B. Berringer
John B. Berringer
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/s/ Catalina Sugayan
Catalina Sugayan
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